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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Before the
Federal Communications Commission
Washington, D.C. 20554

In the Matter of) MM Docket No. 92-282
)
Amendment of Section 73.202(b),) RM-8080
Table of Allotments,) RM-
FM Broadcast Stations,) RM-
(Marco, Punta Gorda, and)
Charlotte Harbor, Florida))

To: Chief, Allocations Branch
Policy and Rules Division
Mass Media Bureau

JOINT COMMENTS
COUNTERPROPOSAL
AND
MOTION FOR MODIFICATION OF LICENSES

InterMart Broadcasting Southwest Florida, Inc., and Naples Broadcasting Corporation ("Joint Commenters"), by their attorney, and pursuant to Title 47 C.F.R. §1.420(d), hereby file these comments and counterproposal to the *Notice of Proposed Rulemaking (Marco, Florida)* ("NPRM"), DA 92-1581, released December 1, 1992, which proposed to allot FM Channel *255A to Marco, Florida, as a noncommercial educational channel.¹ Joint Commenters also move the Commission to modify the licenses of Station WQLM-FM², Punta Gorda, and WGUF(FM), Marco, Florida, as set out

¹ Comments and counterproposals are due by January 21, 1993, thus this counterproposal is timely filed. As the channel change of WGUF to Channel 255A is mutually exclusive with Petitioner's proposal to allot Channel *255A to Marco, this counterproposal must be interposed now.

² There is pending a request to change the call sign of WQLM-FM to "WIKX".

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herein. In support whereof, Joint Commenters show the following:

Background

The University of South Florida ("Petitioner") on August 18, 1992, filed a Petition for Rulemaking seeking allotment of FM Channel 255A to Marco Island, Florida.³ Therein, the Petitioner submitted an Engineering Statement that claims:

"It has earlier been determined that there is no channel available in the reserved noncommercial educational band from 88.1 to 91.9 MHz which could be operated to serve Marco Island in accordance with the rules of the FCC."

This statement is incorrect. As shown in the attached Technical Exhibit TE-1, noncommercial educational reserved channel 219A is available for utilization at Marco. Because of this fact, there is no need for the Commission to make an exception to its general policy of assigning noncommercial educational licensees to the reserved portion of the FM band (Channels 201-220). A better utilization of the spectrum is proposed herein. Joint Commenters propose the improvement of two stations, the initiation of first local service by one of them, and the initiation of new noncommercial educational service to Marco on Channel 219A.

³ Marco Island, Florida, is just that: an island. The community on Marco Island, Florida, to which radio stations can be licensed is "Marco". The NPRM proposed to allot Channel *255A to Marco.

Charlotte Harbor, Florida

InterMart Broadcasting Southwest Florida, Inc.

("InterMart"), one of the Joint Commenters, is licensee of Station WQLM-FM, which operates on Channel 225C2 at Punta Gorda, Florida. The attached Technical Statement shows that WQLM-FM can upgrade to Channel 225C1 if Station WGUF, which operates on Channel 224A at Marco, Florida, moves to Channel 255A.⁴ WQLM-FM also proposes to change its community of license to Charlotte Harbor, Florida, which will bring that community first local service. Charlotte Harbor is a census designated place (CDP) in Charlotte County, Florida, with a 1980 population of 2,084 persons. The 1990 population of Charlotte Harbor was 3,327.⁵ Counsel is informed that the only incorporated city in Charlotte County is Punta Gorda. Charlotte Harbor is a community to which an FM station can be assigned.⁶ Charlotte Harbor has two retail shopping

⁴ Joint Commenters have an agreement between them concerning allocation of the costs of the channel changes contemplated herein. Therefore, Joint Commenters believe they have satisfied the requirements of the "reimbursement" portion of para. 9 of *FM Channel Assignments (Brookville and Punxsutawney, PA)*, 3 FCC Rcd 5555 [65 RR2d 493] (1988).

⁵ Source: 1990 Census.

⁶ The Commission has assigned FM channel 261C1 to Port Charlotte, Florida (See Title 47 C.F.R. §73.202(b)). The Commission has proposed the assignment of FM channel 255A to Murdock, Florida. Both Port Charlotte and Murdock are unincorporated communities in Charlotte County. The source of most of the information regarding Charlotte Harbor is the Charlotte County Statistical Prospectus, 1991 Edition, published by the Charlotte County Chamber of Commerce.

centers; Harbor Square and School House Square. Together, these shopping centers boast 65 retail businesses. The Punta Gorda/Port Charlotte Telephone Directory lists the following businesses and organizations: Charlotte Harbor Auto Sales, Charlotte Harbor Cabinets, Charlotte Harbor Environmental Center, Inc., Charlotte Harbor Exhaust, Charlotte Harbor Imports, Charlotte Harbor RV Park, Charlotte Harbor Seaplane Base, Charlotte Harbor Shell. Charlotte Harbor also has its own elementary school (Peace River Public Elementary School.) Charlotte Harbor has its own Water Association, which has a permitted capacity of 450,000 gallons per day serving 2,165 residential connections. Undersigned counsel is informed that Charlotte Harbor has at least two churches, Harbor View Christian Church and First Baptist Church. Counsel also is informed that Charlotte Harbor has its own yacht club. Joint Commenters will provide additional evidence of community status upon request. The allotment of Channel 225C1 to Charlotte Harbor will not deprive Punta Gorda of its only facility, since InterMart's co-owned WCCF(AM) will remain licensed to Punta Gorda. Additionally, the presently authorized 1.0 mV/m contour of WQLM-FM will potentially be encompassed by the 1.0 mV/m contour of a maximum Class C1 facility operating at Charlotte Harbor. Therefore, there would be no loss of 1 mV/m service to Punta Gorda by the allotting WQLM-FM to Charlotte Harbor.

Marco, Florida

Naples Broadcasting Corporation, the other Joint Commenter, is licensee of WGUF(FM), which operates on Channel 224A at Marco, Florida. The allotment of Channel 255A as a commercial channel to Marco, and the modification of WGUF's license to operate on the channel would potentially enable WGUF to operate as a 6.0 kilowatt facility. At the present, WGUF is restricted to 4.1 kilowatts at 100 meters under a shortspace condition with WQLM-FM, Punta Gorda.

Public Interest Considerations

The public interest will be better served by adopting this counterproposal than by allotting Channel *255A to Marco as a noncommercial educational channel. First, this counterproposal will permit the expansion of service by WQLM-FM to provide 1.0 mV/m service to 813,763 persons. This represents an increase of 344,672 persons over its presently licensed Class C2 facility. Second, adoption of the counterproposal will provide for first local service to Charlotte Harbor, Florida. Only two factors must be demonstrated in order for a licensee to change its city of license in a rule making proceeding: (1) the channel changes must be mutually exclusive, and (2) the rulemaking must not deprive a community of its only local transmission service. Here, the allotment of Channel 225C1 to Charlotte Harbor is mutually exclusive with Channel 225C2 at Punta

Gorda, Florida. Also, Punta Gorda will still receive local transmission service from WCCF. The Commission has stated that in making the determination of whether to amend the Table of Allotments it would "take into account the totality of the service improvements resulting from a proposed change in community of license" See *Modification of FM and TV Authorizations (New Community of License)*, 4 FCC Rcd 4870, 66 RR 2d 877 (1989). The Commission must compare the proposed allotment plan to the existing state of allotments for the communities involved. Clearly, adoption of Joint Commenters' counterproposal would result in a net service benefit for the communities involved. That is, the plan would result in a preferential arrangement of allotments when analyzed under the paradigm in *Revision of FM Assignment Policies and Procedures*, 90 FCC 2d 88, 92 (1982), and *Sixth Report and Order*, 41 FCC 148 (1952). Third, adoption of this counterproposal will afford Petitioner an even better result than it has sought. This counterproposal will permit Petitioner to expand its operations into Marco on reserved noncommercial FM Channel 219A, while permitting expanded service by WQLM-FM and WGUF. In short, this counterproposal provides a "win-win" situation for the public and all the parties to this proceeding.

If the Commission allots the channels as proposed herein, both InterMart and Naples Broadcasting Corporation will promptly file applications seeking construction permits

for operation of WQLM-FM and WGUF(FM) on the modified channels. Upon grant thereof, they will promptly construct the modified facilities.

Changed Allotments

	CHANNEL NO.	
CITY	PRESENT	PROPOSED
Charlotte Harbor, FL	---	225C1
Punta Gorda, FL	225C2	---
Marco, FL	224A, 266C1	255A, 266C1

In light of the foregoing, Joint Commenters respectfully urge the Commission to reject Petitioner's proposal to allot Channel *255A to Marco, Florida, and instead to (a) adopt the rearrangement of channels as set forth above; (b) modify the license of WQLM-FM to operate on Channel 225C1 at Charlotte Harbor; and (c) modify the license of WGUF to operate on Channel 255A at Marco.

Respectfully submitted,

**INTERMART BROADCASTING
SOUTHWEST FLORIDA, INC.**

and

MAPLE BROADCASTING CORPORATION

By: 

Gary S. Smithwick
Their Attorney

SMITHWICK & BELENDIUK, P.C.
1990 M Street, N.W., Suite 510
Washington, D.C. 20036
(202) 785-2800

January 21, 1993

⁷ Radio Station WCCF(AM) is licensed to Punta Gorda, FL.

COMMENTS AND COUNTERPROPOSAL
MM DOCKET #92-282
INTERMART BROADCASTING SOUTHWEST FLORIDA, INC.
NAPLES BROADCASTING CORPORATION
CHARLOTTE HARBOR AND MARCO, FLORIDA
January 1993

Technical Exhibit
TE-1

Bromo Communications, Inc.
P.O. Box M - 1331 Ocean Boulevard, Suite 201
St. Simons Island, Georgia 31522
(912) 638-5608

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COMMENTS AND COUNTERPROPOSAL
MM DOCKET #92-282
INTERMART BROADCASTING SOUTHWEST FLORIDA, INC.
NAPLES BROADCASTING CORPORATION
CHARLOTTE HARBOR AND MARCO, FLORIDA
January 1993

TECHNICAL STATEMENT

1. This technical statement and attached exhibits were prepared on behalf of Intermart Broadcasting Southwest Florida, Inc. ("Intermart"), licensee of WQLM-FM, Channel 225C2, Punta Gorda, Florida, and Naples Broadcasting Corporation ("Naples"), licensee of WGUF, Channel 224A, Marco, Florida, hereinafter referred to as Joint Commenters. The Joint Commenters file these comments and counterproposals in response to the Commission's Notice of Rule Making in MM Docket #92-282. The Joint Commenters propose to upgrade the facilities of WQLM-FM from Channel 225C2 to Channel 225C1 and reallocate the upgraded channel from Punta Gorda to Charlotte Harbor, Florida. In order to accommodate this upgrade and change of community of license, it is necessary to substitute Channel 255A for Channel 224A at Marco, Florida. The utilization of this substitute channel at Marco is mutually exclusive with the proposed allotment of Channel 255A, which was proposed in MM Docket #92-282.

BACKGROUND

2. The Petitioner in the above noted docket, the University of South Florida ("USF"), has requested the

allotment of Channel 255A to Marco, Florida, and its reservation as a noncommercial channel. USF notes in its Petition for Rule Making that there are no noncommercial channels available which can be used in the Marco, Florida, area. In light of the Petitioner's showing, the Commission had initially concluded that the reservation of Channel 255A would serve the public interest since it would potentially allow for a first non-commercial service to Marco, Florida. However, as set forth below, a non-commercial channel is available for Marco, Florida.

DISCUSSION

3. The Joint Commenters have determined that Channel 219A is available for application purposes at Marco, Florida, and will provide the community with its first non-commercial service. The availability of this channel does allow for the adoption of the Joint Commenters' counterproposal as outlined below. The availability of Channel 219A at Marco, Florida, is based on the return of an application for a new non-commercial station on Channel 219A at Naples, Florida. New Hope Ministry, Inc., had filed an application in May, 1991, File #BPED-910523MG, requesting 1.6 kilowatts at 69 meters height above average terrain for its proposed facility. However, on July 28, 1992, the Commission notified the applicant that there were several technical discrepancies within its application and it was, therefore, being returned.

The applicant did not file a Petition for Reconsideration on the dismissal of its application. Therefore, the application is no longer an impediment to a potential Channel 219A facility at Marco, Florida.

PROPOSAL

4. Channel 225C1 can be allocated to Charlotte Harbor in substitution for Channel 225C2 at Punta Gorda, Florida, at reference coordinates North Latitude 26° 52' 25" and West Longitude 82° 15' 43". This represents a site restriction of 22.5 kilometers west/southwest of the community in order to avoid shortspacing the licensed and construction permit facilities of WKZY, Channel 223A, LaBelle, Florida, and WFLZ, Channel 227C, Tampa, Florida. Exhibit #1 is a usable area study for Channel 225C1 at Charlotte Harbor and demonstrates where a transmitter site could be located for this channel. Exhibit #2 is a §73.207 spacing analysis which demonstrates that Channel 225C1 meets the Commission's minimum distance separation requirements to all other licensed, applied for and proposed facilities. Both Exhibits #1 and #2 assume that WGUF, Channel 224A, at Marco, Florida, has been ordered to Channel 255A, as described below.

5. Channel 255A can be allocated to Marco, Florida, at reference coordinates North Latitude 25° 59' 57" and West Longitude 81° 38' 38". These are the same coordinates

proposed in the Notice of Proposed Rule Making, MM Docket #92-282, which are site restricted 14.0 kilometers east/northeast of the community. From these coordinates, as demonstrated on Exhibit #3, Channel 255A can provide city grade service to the community of Marco, Florida. Exhibit #4 is a §73.207 spacing analysis which demonstrates that from these reference coordinates, Channel 255A meets the Commission's minimum spacing distance separation requirements to all other licensed, applied for or proposed facilities. These coordinates, while not being the presently licensed WGUF site, reflect a minor site restriction from that licensed facility.¹ The utilization of Channel 255A at Marco, Florida, assumes that Channel 219A is being utilized by USF, or another non-commercial entity, as described below.

6. Channel 219A can be utilized in the vicinity of Marco, Florida, and comply with §73.506, 73.509 and 73.525 of the Commission's regulations. As shown on Exhibit #5, there are two non-commercial facilities which potentially impact the use of Channel 219A at Marco. Exhibit #5A and #5B are Channel 219A allocation studies which show that a maximum

1) Naples Broadcasting Corporation (one of the Joint Commenters in this docket) consents to the hypothetical relocation of its transmitter site in order to accommodate the substitution of channels at Marco. It, likewise, notes that it potentially could utilize its existing licensed facility at coordinates North Latitude 26° 01' 50" and West Longitude 81° 38' 33" in an application for Channel 255A, utilizing §73.215 contour-to-contour protection to one of the two proposed Channel 255A reference sites at Murdock, Florida.

6.0 kilowatt Class A facility from a hypothetical site on Marco Island (North Latitude 26° 54' 40" and West Longitude 81° 43' 20") will not cause prohibitive overlap of contours between the hypothetical Marco facility and either of the two other non-commercial Class A facilities. Additionally, Channel 219A, from these coordinates, meets §73.207 spacing requirements towards WCOO, Channel 221A, Immokalee, Florida.

7. In addition, we have preliminarily determined only one of the two Channel 6 television stations in the state of Florida, (WCIX, Miami, Florida) would be considered to be potentially impacted by the utilization of Channel 219A at Marco, Florida. We have preliminarily determined that the interfering contour of Channel 219A, from these reference coordinates (83 dBu 50/10 and based on §73.525 regulations utilizing Figure 2 of §73.599), does not overlap with the 47 dBu 50/50 licensed contour of WCIX, Miami, Florida. As such, while Channel 6 is within the affected distance of Channel 219A at Marco, it will receive no interference from a proposal built at these hypothetical reference coordinates.

8. The Joint Commenters propose the following changes to §73.202(b) of the Commission's rules:

Charlotte Harbor, Florida

Present

None

Proposed

225C1

Punta Gorda, Florida

Present

225C2

Proposed

None ²

Marco, Florida

Present

224A, 266C1

Proposed

255A, 266C1 ³

PUBLIC INTEREST ASPECTS

9. The activation of the Joint Commenters counterproposal will provide Charlotte Harbor with its first locally licensed full-time radio facility. Charlotte Harbor is a Census Designated Place (CDP) in Charlotte County with a population of 2,084 persons. ⁴ The allocation of this channel to Charlotte Harbor will not deprive Punta Gorda of its only licensed facility, since WCCF will remain licensed to the community. In addition, as demonstrated on Exhibit #6, the presently authorized 1.0 mV/m contour of WQLM-FM will potentially be encompassed by the 1.0 mV/m contour of a

2) Punta Gorda, Florida, will continue to receive full-time service from WCCF (AM), 1580 kHz, Punta Gorda, Florida. WCCF (AM) is co-owned with WQLM-FM. WCCF (AM) has an application pending to initiate full-time service to Punta Gorda, Florida.

3) Channel 219A would not officially be allocated to Marco, Florida, but as demonstrated in Exhibit #5 can be utilized at Marco as a 6.0 kilowatt Class A facility.

4) Population information based on 1980 U.S. Census.

maximum C1 facility at Charlotte Harbor. Therefore, no loss of service will occur as a result of the changing of community of license for WQLM-FM. In addition, the allotment of Channel 225C1 to Charlotte Harbor is mutually exclusive with the present Channel 225A allotment at Punta Gorda. The two communities are located in close proximity to one another in Charlotte County, Florida. Once Channel 225C1 is allocated to Charlotte Harbor, it can potentially provide 1.0 mV/m service to 813,763 persons. This represents an increase of 344,672 persons over its presently licensed C2 facility. ⁵

10. When Channel 255A is allocated to Marco, Florida, from the reference site, it will potentially enable WGUF to operate as a 6.0 kilowatt 100 meter height above average terrain facility. At the present time, WGUF is a limited Class A, operating with 4.1 kilowatts at 100 meters, under §73.215 of the Commission's rules, due to a shortspace with the licensed facility of WQLM-FM, Channel 225C2, Punta Gorda, Florida.

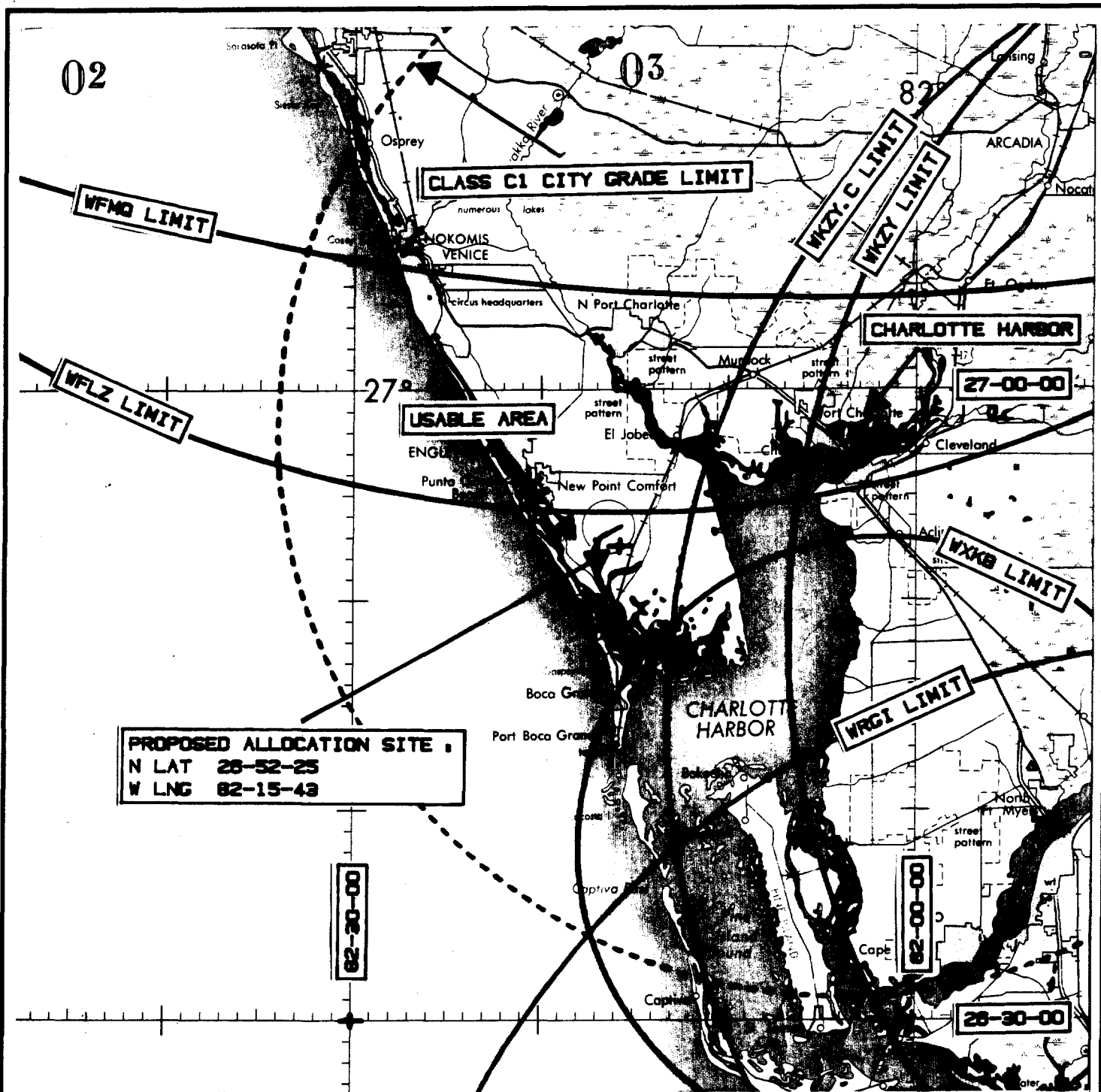
11. The adoption of the counterproposal and the availability of Channel 219A for utilization as a non-commercial facility at Marco, Florida, will enable first new local service to Charlotte Harbor, Florida, while not depriving Punta Gorda of its only licensed service and will enable WGUF to operate as a maximum 6.0 kilowatt Class A facility and potentially allow for first noncommercial to Marco on Channel 219.

5) Population data extracted from PL 94-171 Files, 1990 Census.

12. If Channel 225C1 is allotted to Charlotte Harbor, Florida, Intermart will file, on a timely basis, an application to modify the facilities of WQLM-FM to operate on the upgraded channel at Charlotte Harbor. Additionally, if Channel 255A is allocated to Marco, Florida, Naples will file, on a timely basis, an application for minor change to make the necessary changes in the facilities of WGUF.

13. The foregoing technical statement and attached exhibits were prepared on behalf of Intermart Broadcasting Southwest Florida, Inc., and Naples Broadcasting Corporation, by Bromo Communications, Inc., their Technical Consultants. All information herein is true and accurate to the best of our belief and knowledge. Should questions arise during consideration of these comments, we would welcome the opportunity to discuss the matter by phone at (912) 638-5608.

14. All of the proposed channel upgrades and impacting stations were extracted from the NTIA FM Database, updated as of December, 1992. We assume no liability for omissions or errors in that database, which may be contrary to the proposals made herein.



USABLE AREA CHANNEL 225C1

MAP IS A PORTION OF THE 1:500,000 SCALE
MIAMI SECTIONAL AERONAUTICAL CHART.

MAP ASSUMES WGUF OPERATING ON CHANNEL
255A AT MARCO, FLORIDA.

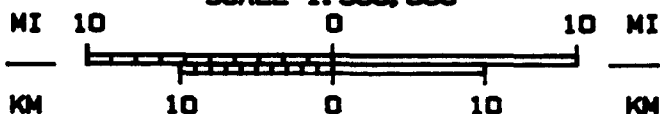
EXHIBIT #1

COMMENTS & COUNTERPROPOSAL
MM DOCKET # 92-282

INTERMART BCTG SW FLA, INC
NAPLES BCTG CORP
CHARLOTTE HARBOR/MARCO, FL

January 1993

SCALE 1:500,000



BROMO
COMMUNICATIONS

BROADCAST
TECHNICAL CONSULTANTS

St Simons Island, Georgia

Washington, D.C.

ALLOCATION STUDY FOR CHARLOTTE HARBOR, FLORIDA
USING PROPOSED ALLOCATION SITE AS REFERENCE

REFERENCE	CLASS C1	DISPLAY DATES
26 52 25 N		DATA 01-04-93
82 15 43 W	Current rules spacings	SEARCH 01-20-93
----- CHANNEL 225 - 92.9 MHz -----		

CALL TYPE	CH# LAT	CITY LNG	STATE PWR	BEAR' HT	D-KM D-M1	R-KM R-M1	MARGIN (KM)
<hr/>							
WQLMFM	225C2	Punta Gorda	FL	84.0	21.09	224.0	-202.91
LI CN	26 53 37	82 03 03	50.000 kW	110M	13.1	139.2	
Intermart Broadcasting SW Florida., Inc BLH901022KD							
>to Channel 225C1 Charlotte Harbor, Florida							
* WGUF	224A	Marco	FL	146.5	111.99	133.0	-21.01
LI ZCN	26 01 50	81 38 33	4.100 kW	100M	69.6	82.7	
Naples Broadcasting Corporation BLH920407KC							
>to Channel 255A as proposed by Intermart/Naples							
WFLZ	227C	Tampa	FL	360.0	107.33	105.0	2.33
LI CY	27 50 32	82 15 46	100.000 kW	414M	66.7	65.3	
Jacor Broadcasting of Tampa BLH880627KA							
WKZY.C	223A	La Belle	FL	100.6	80.89	75.0	5.89
CP CN	26 44 23	81 27 44	6.000 kW	48M	50.3	46.6	
Omega Broadcasting Corporation BPH900830IH							
WXKB	279C2	Cape Coral	FL	138.0	35.03	27.0	8.03
LI CN	26 38 19	82 01 35	50.000 kW	83M	21.8	16.8	
WRCC Partners BLH891226KF							
>*To Channel 280C1 Per D88-512							
WKZY	223A	La Belle	FL	94.3	90.45	75.0	15.45
LI CN	26 48 46	81 21 16	3.000 kW	91M	56.2	46.6	
Omega Broadcasting Corporation BMLH901228KA							
WMFQ	225C2	Ocala	FL	3.9	244.97	224.0	20.97
LI CN	29 04 45	82 05 35	50.000 kW	145M	152.3	139.2	
Greater Ocala Broadcasting Co. BLH880725KA							
WRGI	228A	Naples	FL	147.1	99.07	75.0	24.07
LI CN	26 07 21	81 43 22	3.000 kW	91M	61.6	46.6	
All Communications of Naples BLH5343							
WRGI.C	228A	Naples	FL	147.1	99.07	75.0	24.07
CP CN	26 07 21	81 43 22	2.200 kW	116M	61.6	46.6	
All Communications of Naples BPH871214IC							

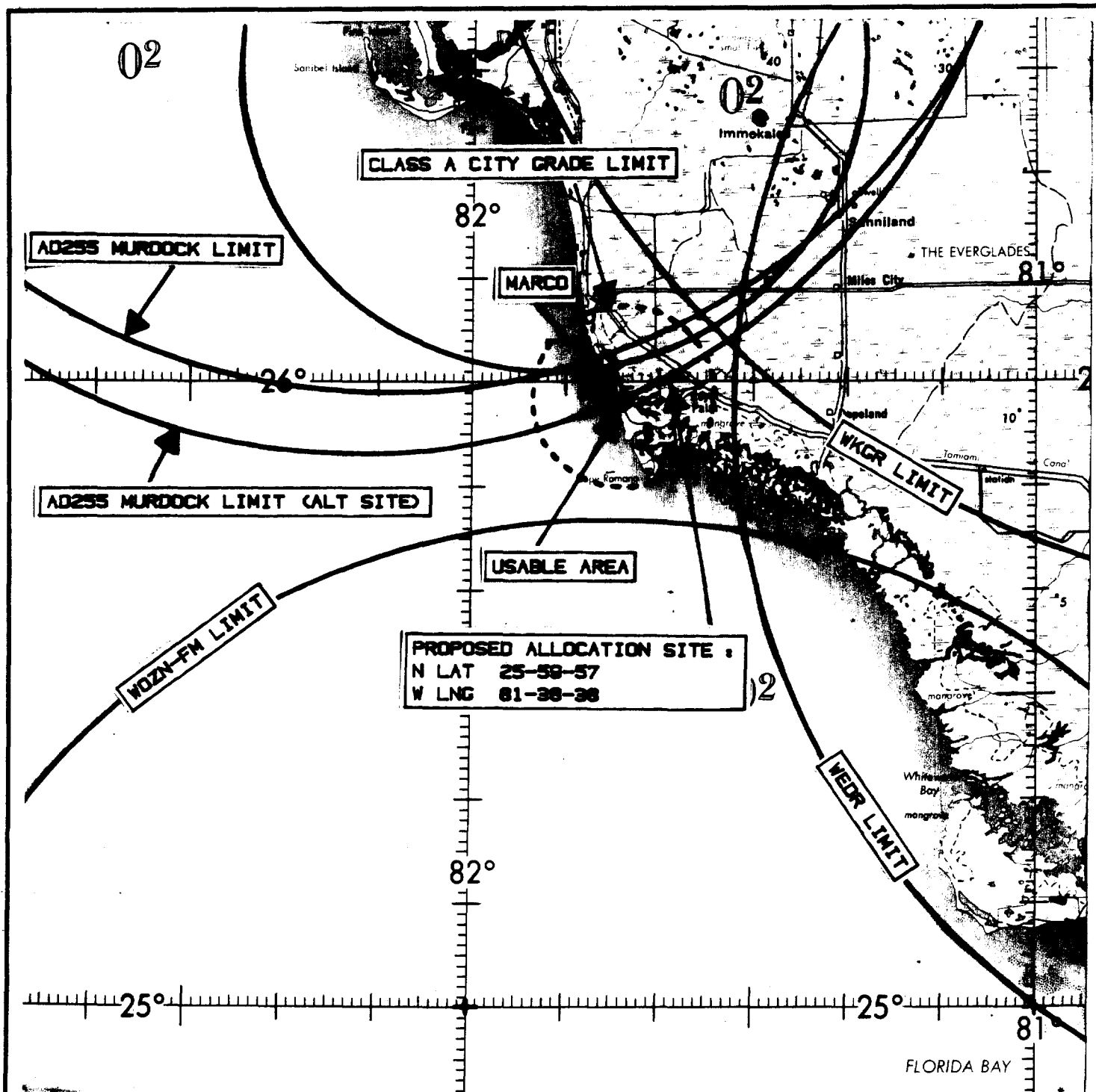
ALLOCATION STUDY CHANNEL 225C1

* NOTE : WGUF TO MOVE TO CHANNEL 255A.

EXHIBIT #2

**COMMENTS & COUNTERPROPOSAL
MM DOCKET # 92-282
INTERMART BCTG SW FLA. INC
NAPLES BCTG CORP
CHARLOTTE HARBOR/MARCO. FL
January 1993**

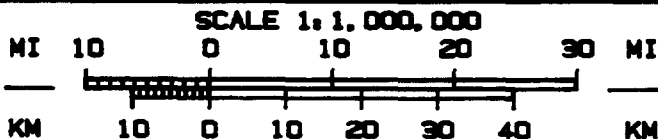
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St Simons Island, Georgia Washington, D.C.



USABLE AREA CHANNEL 255A

MAP IS A PORTION OF THE 1:1,000,000 SCALE
CH-25 WORLD AERONAUTICAL CHART.

EXHIBIT #3
COMMENTS & COUNTERPROPOSAL
MM DOCKET # 92-282
INTERMART BCTG SW FLA, INC
NAPLES BCTG CORP
CHARLOTTE HARBOR/MARCO, FL
January 1993



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Washington, D.C.

ALLOCATION STUDY FOR MARCO, FLORIDA
USING PROPOSED ALLOCATION SITE AS REFERENCE

REFERENCE	CLASS A	DISPLAY DATES
25 59 57 N		DATA 01-04-93
81 38 38 W	Current rules spacings	SEARCH 01-20-93
----- CHANNEL 255 - 98.9 MHz -----		

CALL TYPE	CH# LAT	CITY LNG	STATE PWR	BEAR' HT	D-KM D-M1	R-KM R-M1	MARGIN (KM)
AD255	255A	Marco	FL	0.0	0.00	115.0	-115.00
AD	25 59 57	81 38 38	0.000 kW	0M	0.0	71.5	
<i>Intermart/Naples</i>							
>Counterproposal - MM Docket #92-282 - Restricted 14.0 km Northeast							
AD255	255A	Murdock	FL	331.6	115.26	115.0	0.26
AD	26 54 50	82 11 40	0.000 kW	0M	71.6	71.5	
Highlands Media Company, Inc.							
>Site Restricted 11.9 km Southwest-Counterproposal							
WJBX	257C2	Fort Myers Beach	FL	339.5	59.84	55.0	4.84
LI ZCN	26 30 18	81 51 14	50.000 kW	87M	37.2	34.2	
Schefflera, Inc. BLH920729KC							
AD255	255A	Murdock	FL	336.0	122.80	115.0	7.80
AD	27 00 42	82 08 42	0.000 kW	0M	76.3	71.5	
Murdock Broadcasting RM6915							
WEDR	256C1	Miami	FL	91.4	143.71	133.0	10.71
LI CN	25 57 59	80 12 33	100.000 kW	280M	89.3	82.7	
WEDR, Inc. BLH900430KA							
WKGR	254C	Fort Pierce	FL	45.1	176.39	165.0	11.39
LI CN	27 07 20	80 23 21	100.000 kW	421M	109.6	102.6	
Amaturo Group, Ltd. BLH800428AB							
WOZNFM	254C1	Key West	FL	183.8	157.73	133.0	24.73
LI CN	24 34 42	81 44 49	100.000 kW	38M	98.0	82.7	
Key West Communications, Inc. BLH910110KA							

ALLOCATION STUDY CHANNEL 255A

EXHIBIT #4
COMMENTS & COUNTERPROPOSAL
MM DOCKET # 92-282
INTERMART BCTG SW FLA, INC
NAPLES BCTG CORP
CHARLOTTE HARBOR/MARCO, FL
January 1993

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TECHNICAL CONSULTANTS
St Simons Island, Georgia Washington, D.C.

Stations Considered in Allocation Study

AP219 219A Naples, Florida
North Latitude 26° 08' 25" West Longitude 81° 42' 45"
1.6 kilowatts 69M
New Hope Ministry, Inc.
File # 910523MG
application returned July 28, 1992

WJYO 218A Fort Myers, Florida
North Latitude 26° 30' 18" West Longitude 81° 51' 14"
3.0 kilowatts 87M
Radio Training Network, Inc.
File # BLED-881003KA

WVIJ 219A Port Charlotte, Florida
North Latitude 26° 58' 48" West Longitude 82° 04' 03"
0.380 kilowatts 36M
Port Charlotte Ed. Broadcasting Foundation
File # BLED-870806KC

WVIJ.C 219A Port Charlotte, Florida
North Latitude 27° 04' 14" West Longitude 81° 57' 36"
3.0 kilowatts 100M
Port Charlotte Ed. Broadcasting Foundation
File # BPED-890814MA

WVIJ.A 219A Port Charlotte, Florida
North Latitude 27° 04' 36" 81° 57' 38"
3.6 kilowatts 100M
Port Charlotte Ed. Broadcasting Foundation
File # BPED-920721MC

WCOO 221A Immokalee, Florida
North Latitude 26° 21' 19" West Longitude 81° 21' 03"
2.1 kilowatts 116M
Naples Radio, Inc.
File # BLH-900423KB
Complies with §73.207 of the Commission's Rules.

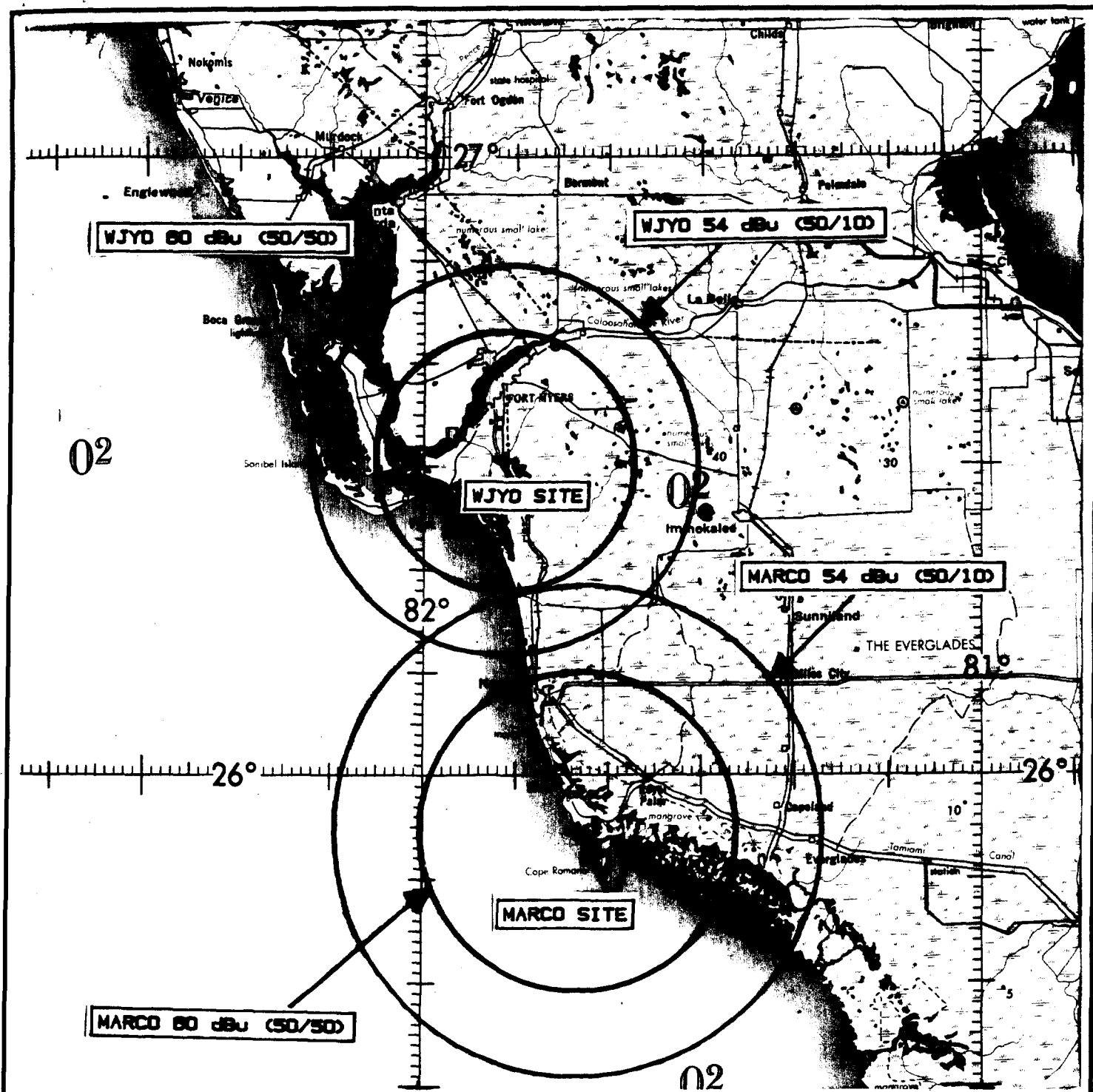
CHANNEL 219 ALLOCATION STUDY

* NOTE : THE NEW HOPE MINISTRY, INC.
APPLICATION AT NAPLES, FLORIDA WAS
RETURNED BY THE COMMISSION ON JULY 28,
1992. IT IS NOT CONSIDERED A PRECLUSION
TO A CHANNEL 219A APPLICATION AT MARCO,
FLORIDA.

EXHIBIT #5

COMMENTS & COUNTERPROPOSAL
MM DOCKET # 92-282
INTERMART BCTG SW FLA. INC
NAPLES BCTG CORP
CHARLOTTE HARBOR/MARCO. FL
January 1993

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St Simons Island, Georgia
Washington, D.C.



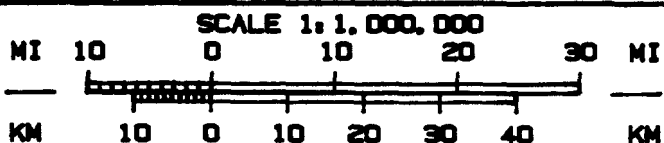
MARCO & WJYO CONTOURS

MAP IS A PORTION OF THE 1:1,000,000 SCALE CH-25 WORLD AERONAUTICAL CHART.

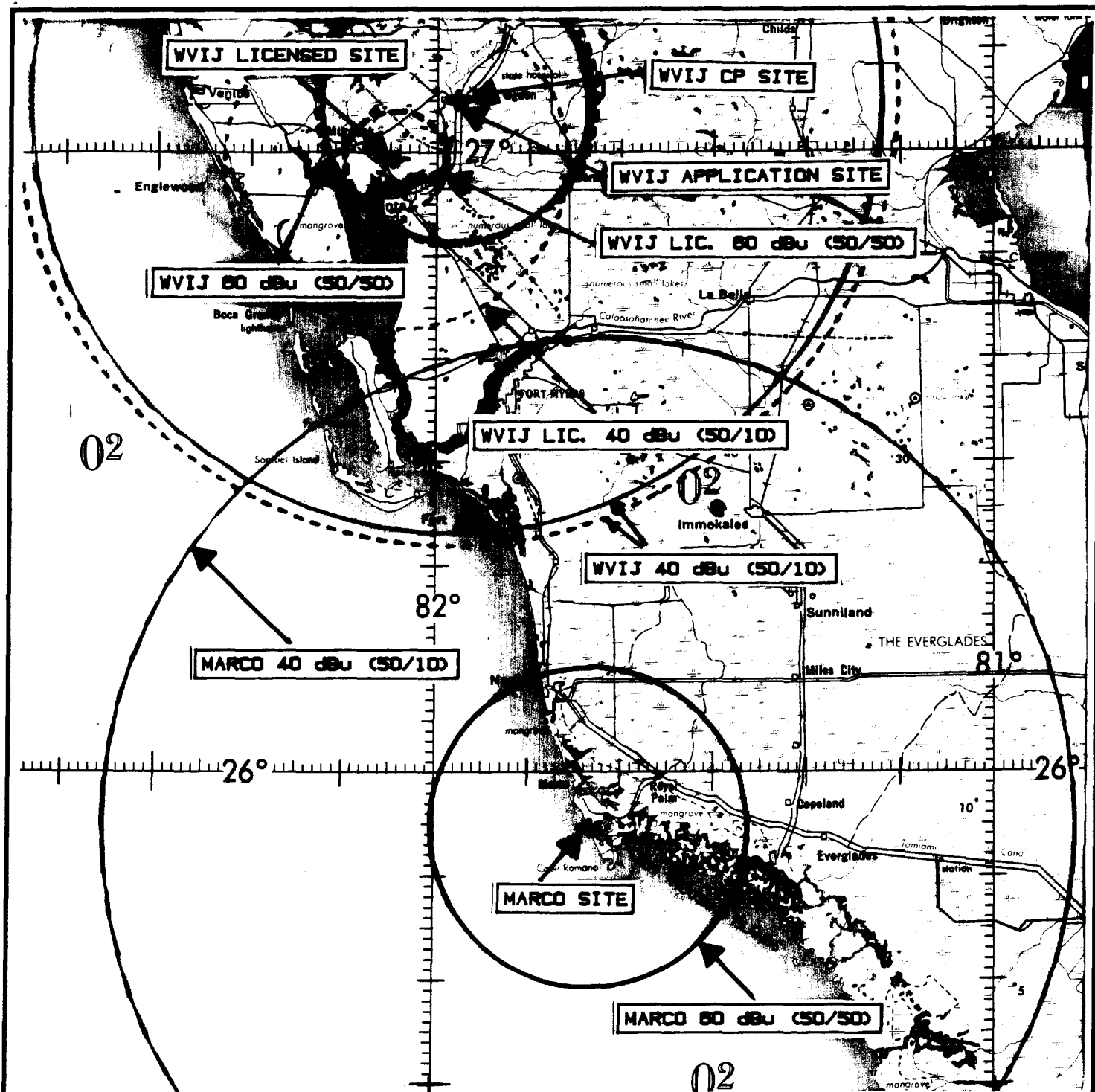
SEE EXHIBIT #5 FOR TECHNICAL DATA ON WJYO, CHANNEL 218A, FORT MYERS, FLORIDA.

EXHIBIT #5A

COMMENTS & COUNTERPROPOSAL
MM DOCKET # 92-282
INTERMART BCTG SW FLA, INC
NAPLES BCTG CORP
CHARLOTTE HARBOR/MARCO, FL
January 1993



BROMO
COMMUNICATIONS
BROADCAST
TECHNICAL CONSULTANTS
St Simons Island, Georgia
Washington, D.C.



MARCO & WVIJ CONTOURS

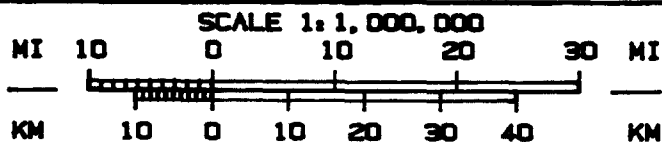
MAP IS A PORTION OF THE 1:1,000,000 SCALE CH-25 WORLD AERONAUTICAL CHART.

SEE EXHIBIT #5 FOR TECHNICAL DATA ON WVIJ, CHANNEL 219A, PORT CHARLOTTE, FLORIDA.

EXHIBIT #5B

COMMENTS & COUNTERPROPOSAL
MM DOCKET # 92-282
INTERMART BCTG SW FLA, INC
NAPLES BCTG CORP
CHARLOTTE HARBOR/MARCO, FL

January 1993

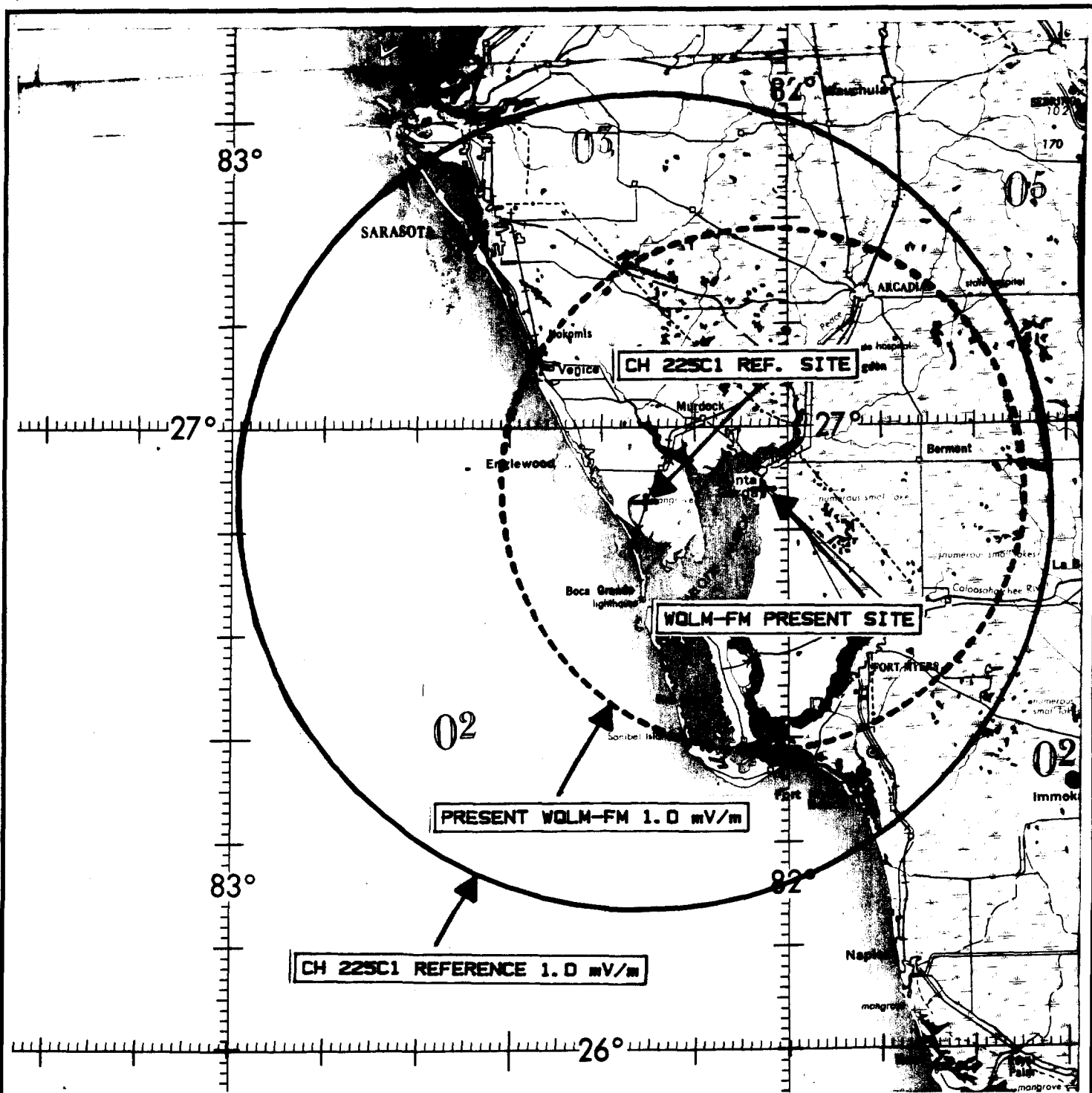


BROMO
COMMUNICATIONS

St Simons Island, Georgia

BROADCAST
TECHNICAL CONSULTANTS

Washington, D.C.

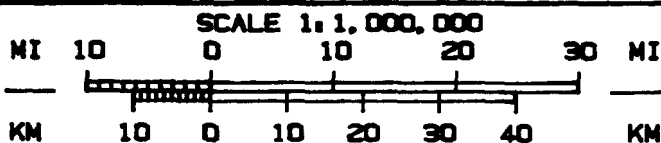


PRESENT & PROPOSED 1.0 mV/m

MAP IS A PORTION OF THE 1:1,000,000 SCALE
CH-25 WORLD AERONAUTICAL CHART.

EXHIBIT #6

COMMENTS & COUNTERPROPOSAL
MM DOCKET # 92-282
INTERMART BCTG SW FLA, INC
NAPLES BCTG CORP
CHARLOTTE HARBOR/MARCO, FL
January 1993



BROMO BROADCAST
COMMUNICATIONS TECHNICAL CONSULTANTS
St Simons Island, Georgia Washington, D.C.

AFFIDAVIT AND QUALIFICATIONS OF CONSULTANT

State of Georgia)
St. Simons Island)
County of Glynn)

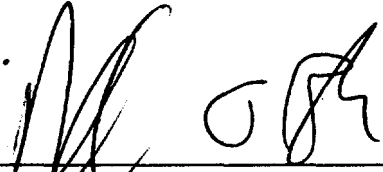
ss:

JEFFERSON G. BROCK being duly sworn, deposes and says that he is an officer of Bromo Communications, Inc. Bromo has been engaged by Intermart Broadcasting Southwest Florida, Inc., and Naples Broadcasting Corporation to prepare the attached Technical Exhibit.

His qualifications are a matter of record before the Federal Communications Commission. He has been active in Broadcast Engineering since 1979.

The attached report was either prepared by him or under his direction and all material and exhibits attached hereto are believed to be true and correct.

This the 20th day of January, 1993.



Jefferson G. Brock
Affiant

Sworn to and subscribed before
me this the 20th day of January, 1993.



Notary Public, State of Georgia

My Commission Expires: September 8, 1995